

***BROWN & CONNERY, LLP***

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Attorneys for Plaintiffs,  
Trustees of I.W. District Council  
(Philadelphia and Vicinity)

**TRUSTEES OF IRON WORKERS DISTRICT  
COUNCIL (PHILADELPHIA AND VICINITY)**  
6401 Castor Avenue  
Philadelphia, PA 19149

and

**IRON WORKERS DISTRICT COUNCIL  
(PHILADELPHIA AND VICINITY)  
BENEFIT AND PENSION FUND**  
6401 Castor Avenue  
Philadelphia, PA 19149

Plaintiffs,

vs.

JHE, INC.  
306 Weathervane Commons  
Richboro, PA 18954

Defendant.

**IN THE UNITED STATES  
DISTRICT COURT FOR THE EASTERN  
DISTRICT OF PENNSYLVANIA**

CIVIL ACTION NO. 02-2795

**CERTIFICATION IN SUPPORT OF  
REQUEST FOR DEFAULT**

Stephanie Nolan Deviney, of full age, hereby certifies and says:

1. I am an attorney for the law firm of Brown & Connery, LLP, attorneys for the Plaintiffs in this matter. I have personal knowledge of the facts set forth below and I am authorized to make this certification.

2. On May 10, 2002, Plaintiffs filed a complaint in the United States District

Court for the Eastern District of Pennsylvania against defendant, JHE, Inc. (the “Defendant”).

3. The complaint and summons were served on Defendant on May 28, 2002.

See Exhibit A.

4. More than twenty (20) days have passed since the date on which the Defendant was served with the complaint and summons.

5. The Defendant has failed to answer or otherwise defend as to Plaintiffs’ complaint, or to serve a copy of any answer or other defense which it might have had upon me.

6. This certification is made in accordance with Rule 55(a) of the Federal Rules of Civil Procedure, for the purpose of enabling Plaintiffs to obtain an entry of default against the Defendant for its failure to answer or otherwise defend as to Plaintiffs’ complaint.

7. Pursuant to 28 U.S.C. §1746, I certify under penalty of perjury that the foregoing is true and correct.

Dated: September 19, 2002

/s/Stephanie Nolan Deviney  
Stephanie Nolan Deviney